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8 Attorneys for Plaintiff

9

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 CANDY TORRES,

13 Plaintiff,

14 vs.

15 ALLAN ROTHSTEIN, et al.

16 Defendants.

No. 2:19-cv-00594-APG-EJY

PLAINTIFF'S EXHIBIT LIST FOR  
TRIAL

Trial:

Date: August 8, 2022  
Time: 9:00 am

18 Pursuant to the Court's Order Regarding Trial (ECF 191), as modified at the  
19 Calendar Conference, plaintiff Candy Torres hereby submits Plaintiff's

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Exhibit List for Trial.<sup>1</sup>

\* \* \*

Dated: August 3, 2022.

Respectfully submitted,

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<sup>1</sup>The parties stipulated today to extend the deadline for filing trial documents from today, Wednesday, August 2, 2022, to Thursday, August 3, 2022, to accommodate counsel. (ECF 203.) As of the existing deadline, no order had issued; accordingly, plaintiff files her trial documents in accordance with the existing order.

**Exhibit List**

***Torres v. Rothstein*, Case 2:19-cv-00594-APG-EJY**  
**Exhibits for: Plaintiff**

<b>Date Marked</b>	<b>Date Admitted</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Exhibit Description</b>
		3		Redfin.com profile of 11893 Wedgebrook (Page 1 only) Depo. Exh. 3
		5		Residential Property Management Agreement dated 07/30/10 (PUNT00001—PUNT0016) Depo. Exh. 5
		13		Property management statement from Rothstein to Puntney dated 11/8/2017 (PUNT00177—PUNT00178) Depo. Exh. 13
		14		Emails between Puntney and Rothstein re HOA fine dated 5/25/17 to 5/30/17 (PUNT00134—PUNT00136) Depo. Exh. 14
		15		10-Day Demand from Rachel Douglas to Rothstein dated 07/17/17 (ROTH0047) Depo. Exh. 15
		19		Email from Rothstein to Puntney with August property management statement dated 08/20/18 (PUNT00237—PUNT00238)

**Exhibit List*****Torres v. Rothstein*, Case 2:19-cv-00594-APG-EJY  
Exhibits for: Plaintiff**

<b>Date Marked</b>	<b>Date Admitted</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Exhibit Description</b>
				Depo. Exh. 19
		21		Email from Rothstein to Puntney with September property management statement dated 09/21/18 (PUNT00261—PUNT00262) Depo. Exh. 21
		22		Emails between Rothstein and Puntney re utilities at 11893 Wedgebrook dated 09/26/18 (PUNT00263—PUNT00264) Depo. Exh. 22
		23		MLS listing of 11893 Wedgebrook (ROTH00233) Depo. Exh. 23
		24		Emails between Rothstein and Puntney re Wedgebrook foreclosure dated 09/04/18 – 09/06/18 (PUNT00243—PUNT00244) Depo. Exh. 24
		25		Email from Rothstein to Puntney re Wedgebrook foreclosure 09/19/2018 (PUNT00256) Depo. Exh. 25
		27		Emails from Rothstein to Puntney re letter confirming property

**Exhibit List*****Torres v. Rothstein*, Case 2:19-cv-00594-APG-EJY  
Exhibits for: Plaintiff**

<b>Date Marked</b>	<b>Date Admitted</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Exhibit Description</b>
				management agreement 10/12/18 – 10/13/18 (PUNT00279) Depo. Exh.27
		28		Emails between Puntney and Rothstein confirming property management agreement 10/15/18 (PUNT00282) Depo. Exh.28
		29		Emails from Rothstein to Puntney re listing Wedgebrook house 09/13/18 – 10/09/18 (PUNT00268—PUNT00269) Depo. Exh.29
		30		Email from Wayneisha Thomas to Rothstein re Candy Torres housing voucher dated 10/24/18 (ROTH00300—ROTH00301) Depo. Exh.30
		31		Email from Rothstein to Puntney re Wedgebrook foreclosure dated 10/26/18 (PUNT00287) Depo. Exh.31
		32		Emails between Rothstein and Puntney re Section 8 dated 10/27/18 (PUNT00288) Depo. Exh.32

**Exhibit List*****Torres v. Rothstein*, Case 2:19-cv-00594-APG-EJY  
Exhibits for: Plaintiff**

<b>Date Marked</b>	<b>Date Admitted</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Exhibit Description</b>
		33		Torres lease packet sent to Puntneyfor 11893 Wedgebrook dated 11/23/18 (PUNT00017—PUNT00033) Depo. Exh.33
		34		Torres lease packet (11-23-2018) submitted to and returned by SNRHA, (ROTH00376—ROTH00407) Depo. Exh.34
		35		Torres lease packet (11-23-2018) (ROTH00442—ROTH00464) Depo. Exh.35
		36		Release of Liability and Assumption of Risk dated 11/23/18 (ROTH00477—ROTH00478) Depo. Exh.36
		37		Emails between Torres and Rothstein re non-functioning appliances at 11893 Wedgebrook dated 11/26/18 (PUNT00290) Depo. Exh.37
		38		Indemnity Agreement dated 11/23/18 (ROTH00500) Depo. Exh.38
		40		Addendum No. 1 to Residential

**Exhibit List*****Torres v. Rothstein*, Case 2:19-cv-00594-APG-EJY  
Exhibits for: Plaintiff**

<b>Date Marked</b>	<b>Date Admitted</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Exhibit Description</b>
				Lease Agreement dated 12/25/18 (PUNT00032) Depo. Exh.40
		41		Email from Rothstein to Torres re late charges dated 12/28/18 (ROTH00434) Depo. Exh.41
		42		Emails between Rothstein and Torres re late rent charges, ladder dispute, and appliance problems dated 12/28/18 – 01/02/19 (ROTH00119—ROTH00123) Depo. Exh. 42
		43		Rent Receipt Agreement dated 12/30/18 (ROTH00245) Depo. Exh.43
		44		Email from Rothstein to Puntney with December-January property management statement dated 01/13/19 (PUNT00295—PUNT00296) Depo. Exh.44
		45		Email from Rothstein to Torres re late rent charges dated 01/13/19 (ROTH00252) Depo. Exh.45

**Exhibit List*****Torres v. Rothstein*, Case 2:19-cv-00594-APG-EJY  
Exhibits for: Plaintiff**

<b>Date Marked</b>	<b>Date Admitted</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Exhibit Description</b>
		46		Rent Receipt Agreement dated 01/13/19 (ROTH00506) Depo. Exh.46
		47		Emails between Rothstein and Torres re rent and utility payment dispute dated 01/13/19 – 01/18/19 (ROTH00583—ROTH00584) Depo. Exh.47
		48		Email from Rothstein to Torres re late fees dated 02/08/19 (ROTH00126) Depo. Exh.48
		49		Tenant's Affidavit/Answer in Opposition to Summary Eviction Regarding Nonpayment of Rent Case 19E003909, Rothstein v Torres, dated 2/15/2019 (14 pages + certificate) (ROTH0075—ROTH0087) Depo. Exh.49 [RJN/ECF 80-1, 85; RJN Exh 5/ECF 193-5]
		50		Statement assessing late fees against Torres dated 03/02/19 (ROTH00504) Depo. Exh.50
		51		March 2019 Property Management statement from Rothstein to



**Exhibit List*****Torres v. Rothstein*, Case 2:19-cv-00594-APG-EJY  
Exhibits for: Plaintiff**

<b>Date Marked</b>	<b>Date Admitted</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Exhibit Description</b>
				Puntney (ROTH0028) Depo. Exh. 51
		52		Email from Rothstein to Puntney dated 04/22/19 with April property management statement (PUNT00307) Depo. Exh. 52
		53		Rothstein's notes re rent and charges to Torres (ROTH00248, 247, 246, 435, 422, 423-427, 433)
		66		Text messages between Rothstein and Puntney (PUNT00524—PUNT00548 only) Depo. Exh.66
		68		Google Maps Aerial Photograph of Rothstein residence Depo. Exh.68
		69		Document Entitled "Sexual Remark or Sexual Statement" Depo. Exh.69
		70		Document Entitled "Sexual Conduct" Depo. Exh.70
		71		Document Entitled "NRS 645.030 'Real Estate Broker' Defined" Depo. Exh.71

**Exhibit List*****Torres v. Rothstein*, Case 2:19-cv-00594-APG-EJY  
Exhibits for: Plaintiff**

<b>Date Marked</b>	<b>Date Admitted</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Exhibit Description</b>
		72		Document Entitled "NRS 645.013 'Designated Property Manager' Defined" Depo. Exh.72
		75		NRS 118A.200 statute text Depo. Exh.75
		76		NRS 118A.275 statute text Depo. Exh.76
		84		Email from Rothstein to Torres with blank rental application dated 09/27/18 (ROTH00574—ROTH00580) Depo. Exh.84
		85		Rental application filled out by Torres dated 09/27/18 (CT 92 – CT 98) Depo. Exh.85
		89		Note written by Torres re finding Wedgebrook house, dated 9/27/18 (ROTH00232) Depo. Exh.89
		90		Notarized letter from Torres re not using Janine Yannis as realtor, dated 10/02/18 (ROTH00226) Depo. Exh.90

**Exhibit List*****Torres v. Rothstein*, Case 2:19-cv-00594-APG-EJY  
Exhibits for: Plaintiff**

<b>Date Marked</b>	<b>Date Admitted</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Exhibit Description</b>
		91		Exclusive Broker Representation Agreement executed by Torres and Rothstein dated 09/29/18 (ROTH00468—ROTH00470) Depo. Exh.91 [Duplicate: Depo Exh 73]
		92		Duties Owed by a Nevada Real Estate Agent form, executed by Rothstein and Torres dated 09/27/18 (ROTH00467) Depo. Exh.92
		93		Emails between Housing Authority and Rothstein re Torres Housing Assistance Payment dated 10/24/18 – 10/30/18 Depo. Exh. 93 [Inclusive of Depo Exh. 39]
		96		Torres rent receipts (pp. 1-11) Depo. Exh. 96 and ROTH0441
		98		Emails between Rothstein and Torres, pp. 1-13 (ROTH00112—ROTH0126) Depo. Exh.98
		99		Emails between Rothstein and Torres, pp 1-4 (ROTH00589 -- ROTH00592)

**Exhibit List**

***Torres v. Rothstein*, Case 2:19-cv-00594-APG-EJY**  
**Exhibits for: Plaintiff**

<b>Date Marked</b>	<b>Date Admitted</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Exhibit Description</b>
				Depo. Exh. 99
		101		Five-Day Notice to Pay Rent or Quit dated February 13, 2019 (2 pages) Depo. Exh.101
		102		Landlord's Affidavit/Complaint for Summary Eviction for Nonpayment of Rent, Case 19E003909, <i>Rothstein v Torres</i> , filed March 13, 2019 (3 pages); Depo. Exh.102 [RJN Exh 6/ECF 193-6]
		103		Notice to appear and Stipulation for dismissal of Action for Summary Eviction for Nonpayment of Rent, Case 19E003909, <i>Rothstein v Torres</i> , dated March 21, 2019 (ROTH00489-490, 496)
		104		SNRHA records by Rothstein and Torres re Wedgebrook House rental, pp 1-99
		105		Wedgebrook NV Energy Folder (ROTH0030-31, 92-95, 242-43), pp 1-8
		106		Wedgebrook NV Energy Notice, 12-19-2018 (CT 75-76)

**Exhibit List**

***Torres v. Rothstein*, Case 2:19-cv-00594-APG-EJY**  
**Exhibits for: Plaintiff**

<b>Date Marked</b>	<b>Date Admitted</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Exhibit Description</b>
		107		Wedgebrook Candy Torres Statement Folder (ROTH 23-24, 27, 243-244, 251, 254, 256, 428), pp 1-9 (LVVWD water bills)
		108		Complaint by the Real Estate Commission of the State of Nevada against Allan Rothstein, <i>Sharath Chandra, etc. v. Allan N. Rothstein</i> , Case No. 2020-359, filed February 24, 2022 [RJN Exh 1/ECF 193-1]
		109		Findings of Fact, Conclusions or Law, and Order by the Nevada Real Estate Commission, filed April 12, 2022, in Sharath Chandra, etc. v. Allan N. Rothstein, Case No. 2020-359 [RJN Exh 2/ECF 193-2]
		110		Nevada Real Estate Division letter of caution to Allan Rothstein dated 6/6/2014 (AR 00833-00855)
		111		Nevada Real Estate Division Notice of Violation re Allan Rothstein dated 7/16/2014 (AR 00348-00355)

**Exhibit List**

***Torres v. Rothstein*, Case 2:19-cv-00594-APG-EJY**  
**Exhibits for: Plaintiff**

<b>Date Marked</b>	<b>Date Admitted</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Exhibit Description</b>
		112		Nevada Real Estate Division Notice of Violation re Allan Rothstein dated 5/7/2014 (AR 00282-00283)
		113		Certified copy of Notice of Default recorded by Clark County Recorder 8/14/2018 (filed at ECF 68-5 pp. 29-37 of 72)[RJN Exh 3/ECF 193-3]
		114		Certified copy of Notice of Rescission recorded by Clark County Recorder 11/2/2018 (filed at ECF 68-5 pp. 39-41 of 74)[RJN Exh 4/ECF 193-4]
		115		Certified Memorandum in Support of Tenant's Answer in Case 19E003909, Rothstein v Torres, filed March 19, 2019, by NLS, pp. 1-47 [RJN Exh 7/ECF 193-7]
		116		Email communications by Rothstein regarding rental of Wedgebrook House, September 2018

**Exhibit List**

***Torres v. Rothstein*, Case 2:19-cv-00594-APG-EJY**  
**Exhibits for: Plaintiff**

<b>Date Marked</b>	<b>Date Admitted</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Exhibit Description</b>
		117		Email communication by Rothstein regarding rental of Wedgebrook House, October and November 2018
		118		Email communication by Rothstein regarding rental of Wedgebrook House, December 2018
		119		Email communication by Rothstein regarding rental of Wedgebrook House, January 2019
		120		Email communication by Rothstein regarding rental of Wedgebrook House, February 2019
		121		Email communication by Rothstein regarding rental of Wedgebrook House, March and April 2019
		122		Security Deposit Trust Acct, JP Morgan Chase Acct xxxx9668, certified by records custodian (pp. 1-24)
		123		JP Morgan Chase Acct xxx1136, certified by records custodian (pp.

**Exhibit List*****Torres v. Rothstein*, Case 2:19-cv-00594-APG-EJY  
Exhibits for: Plaintiff**

<b>Date Marked</b>	<b>Date Admitted</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Exhibit Description</b>
				1-23)
		124		Property Management Trust Account, JP Morgan Chase Acct xxxx9676, certified by records custodian (pp. 1-27)
		125		Rothstein NRED records re licensure (CT 159-168)
		126		Nye County Real Estate Records (certified)
		127		Rothstein website printout 12/2020 (ECF 120-8)
		128		Rothstein website printout 3/2021
		129		Rothstein realtor.com listings 12/2020 (ECF 120-7)
		130		Rothstein RE web listing (vivahomevegas.com 3/2021)
		131		Rothstein RE web listings (home.com 3/2021)



**Exhibit List**

***Torres v. Rothstein, Case 2:19-cv-00594-APG-EJY***  
**Exhibits for: Plaintiff**

<b>Date Marked</b>	<b>Date Admitted</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Exhibit Description</b>
		132		Rothstein RE web listings (vegasdata.com 2021)
		133		Former tenant Rachel Douglas Records re Wedgebrook house
		134		Former tenant Keli Freund Records re Wedgebrook house: Communications: Dave Martinez – Allan Rothstein (AR 1256, 1260, 1287, 1291)
		135		Former tenant Brandon Silva lease cancellation re Wedgebrook House (AR 2092)
		136		Former tenants Jessica and Krisina Turner Records (AR 943)
		137		Defendant Allan Rothstein's Response to Plaintiff's First Request for Admissions, Etc. served 1/21/2020
		138		Defendant Allan Rothstein's Responses and Objections to Plaintiff's First Set of Interrogatories (Nos. 1-9) served

**Exhibit List*****Torres v. Rothstein*, Case 2:19-cv-00594-APG-EJY  
Exhibits for: Plaintiff**

<b>Date Marked</b>	<b>Date Admitted</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Exhibit Description</b>
				9/20/2019
		139		Defendant Allan Rothstein's Amended Responses and Objections to Plaintiff's First Set of Interrogatories (Nos. 1-9) served 12/7/2019
		140		Defendant Allan Rothstein's Responses and Objections to Plaintiff's Second Set of Interrogatories (Nos. 12-13) served 9/20/2019
		141		Rothstein's Torres/Wedgebrook File - Rental Notes (ROTH00248, 247, 246, 435, 433)
		142		Goggle Search Results for "allan rothstein real estate las vegas," (visited 07/31/2022)
		143		Allan Rothstein Website, www.vagasrxreaty.com (visited 07/31/2022)
		144		Zillow Webpage re Rothstein (visited 07/31/2022)

**Exhibit List**

***Torres v. Rothstein*, Case 2:19-cv-00594-APG-EJY  
Exhibits for: Plaintiff**

<b>Date Marked</b>	<b>Date Admitted</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Exhibit Description</b>
		145		Realtor.com Webpage re Rothstein (visited 07/31/2022)
		146		Homes.com Webpage re Rothstein (visited 07/31/2022)

**CERTIFICATE OF SERVICE**

Pursuant to Rule 5 of the Federal Rules of Civil Procedure, on August 3, 2022, I served by email via the ECF system a copy of the attached document – **PLAINTIFF’S EXHIBIT LIST FOR TRIAL** – on the following persons:

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/s/ Christopher Brancart